

Denyce Shorb - 6/22/2017

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
EUGENE DIVISION

KERRY CLARK,)	
)	
Plaintiff,)	
)	
v.)	Case No. 6:17-cv-00033-JR
)	
MICHAEL MAFFEI, in his)	
personal and official)	
capacities; RHETT DAVIS,)	
in his official capacity;)	
and DENYCE SHORB,)	
)	
Defendants.)	
)	

DEPOSITION OF DENYCE SHORB
Taken in Behalf of the Plaintiff

Thursday, June 22, 2017

Reported by:
D. Iwalani Carr, RPR, CSR

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1 BE IT REMEMBERED THAT, pursuant to Federal
 2 Rules of Civil Procedure, the deposition of DENYCE SHORB
 3 was taken before D. Iwalani Carr, RPR, CSR, a
 4 professional shorthand reporter certified by the State
 5 of Oregon, that pursuant to ORS 44.320 said reporter is
 6 empowered to administer oaths to witnesses, that the
 7 above-named witness was placed under oath on Thursday,
 8 June 22, 2017, commencing at the hour of 9:00 a.m., in
 9 the Coos County Courthouse, in the City of Coquille,
 10 County of Coos, State of Oregon.

--oOo--

APPEARANCES:

14 For the Plaintiff: Oregon Law Center
 15 By: Edward Johnson
 Bill Niese
 522 SW 5th Avenue, Suite 812
 16 Portland, OR 97204

17 For the Defendants Law Office of Gerald L. Warren
 18 Maffei and Davis: and Associates
 By: Gerald L. Warren
 901 Capitol Street NE
 19 Salem, OR 97301

20 Also Present: Kerry Clark
 Michael Maffei
 21 Rhett Davis
 Mark Williams
 22
 23
 24
 25

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1 client will get a judgment against you.

2 So do you have any plans to appear in the
3 lawsuit or --

4 A. I'm appearing today.

5 Q. Okay.

6 Have you ever been deposed before?

7 A. What's "deposed" mean?

8 Q. So this is a deposition. So I should back up
9 a little bit and explain what happens here.

10 So you're going to answer questions about
11 this, the incidents, under oath, and then we can use
12 those answers in later proceedings, maybe a motion or a
13 trial.

14 So do you understand that?

15 A. Mm-hm.

16 Q. Okay. So have you ever been part of a lawsuit
17 before, a party to a lawsuit?

18 A. No.

19 Q. You've never sued anyone or no one's ever sued
20 you.

21 A. No.

22 Q. The other thing is, since the court reporter
23 is taking this down, it's best if we go back and forth.
24 So I ask a question and then you answer it and I wait.
25 Sort of the way normal people talk is there's a little

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1 bit of back and forth in the middle of questions and
2 answers, but that doesn't work very well for the court
3 reporter. So --

4 A. (Witness nods head.)

5 Q. Okay.

6 Where do you currently live?

7 A. A physical address?

8 Q. Yes.

9 A. 815 Avenue A, Powers, Oregon.

10 Q. And how long have you lived there?

11 A. Fifteen years.

12 Q. Where did you live before that?

13 A. Myrtle Point.

14 Q. So you've lived in Powers at the same address
15 for the past 15 years?

16 A. Mm-hm.

17 Q. Did you ever own the property located at 460
18 Poplar Street?

19 A. No. My mom, Sylvia Jelen, owned it, and then
20 she willed it to us.

21 Q. And who is "us"?

22 A. Me and my brother, William Mellor.

23 Q. So how long did your mom own the property?

24 A. Probably twenty-plus years.

25 Q. And how do you spell her last name?

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1 Q. And can you describe the condition of the
2 cabin when you lived there in the '90s?

3 A. When I lived there it was in living condition.
4 And then since my mom passed away, it deteriorated
5 because there was no upkeep in the place.

6 Q. So when you say it was in living condition,
7 did it have electricity?

8 A. Yes.

9 Q. Did it have running water?

10 A. Yes.

11 Q. Was there a bathroom in there?

12 A. Yes.

13 Q. Do you know if anyone lived there before you?

14 A. No.

15 Q. Do you know if anyone lived there after you
16 while your mom was still alive?

17 A. No.

18 Q. You don't know or no one did live there?

19 A. Nobody lived there. It was turned into a
20 storage unit.

21 Q. And then after your brother moved into the
22 main house, did anyone live in the cabin?

23 A. Not when he first moved into the main house.
24 It was turned into a storage unit.

25 Q. And whose stuff was in the cabin?

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1 A. Across town.

2 Q. So how far is across town? Is it half a mile
3 or --

4 A. Maybe a half a mile.

5 Q. Did you ever take steps to remove Mr. Clark
6 from the cabin?

7 A. I put a written 72-hour eviction notice on the
8 door. It was taken pictures of and I had a witness.

9 Q. Do you remember when that was?

10 A. August 23rd, 2016.

11 Q. And what was the reason for that 72-hour
12 notice?

13 A. Since he moved in, he never paid. He lived
14 there for free from June until approximately September.

15 Q. Did he ever try to pay you rent?

16 A. No. He said he was going to set up an
17 account, and I didn't want an account, and he had my
18 P.O. box number that he could have sent a money order
19 to.

20 Q. Do you know if he ever paid your brother rent?

21 A. Nope. But he was incarcerated, so he would
22 have never been paid.

23 Q. And again, what was the date that your brother
24 was incarcerated?

25 A. June 19, 2016, to April 24th of 2017.

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1 Q. I'm going to show you an exhibit we'll mark as
2 Deposition Exhibit 1.

3 (Exhibit 1 marked
4 for identification.)

5 Do you recognize that exhibit?

6 A. Yes, I do.

7 Q. What is that?

8 A. That's the rental agreement.

9 Q. And when did you sign this rental agreement?

10 A. I guess it was the first part of June, but it
11 was never dated.

12 Q. And did you have anything to do with creating
13 this rental agreement?

14 A. No.

15 Q. How did you find out about it?

16 A. It was just presented to me.

17 Q. Who presented it to you?

18 A. Kerry Clark.

19 Q. And when he presented it to you, had it
20 already been signed by your brother?

21 A. Yes, it was, and Kerry Clark.

22 Q. And was Angie Armstrong present when you
23 signed it?

24 A. No.

25 Q. Where were you when Kerry Clark presented it

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1 to you?

2 A. In the alley next to 460-1/2 Popular Street.

3 Q. And do you know what he said to you when he
4 showed it to you?

5 A. No. He just handed it to me.

6 Q. And did you have any questions about it?

7 A. Not really. I didn't sign it at that time. I
8 had taken it with me to read it. And then Angie
9 Armstrong said that he wanted it signed so he could have
10 it.

11 Q. And so do you remember approximately when you
12 signed it in relationship to when you first saw it?

13 A. It was probably maybe the middle of June of
14 2016.

15 Q. And what's your understanding of the terms of
16 the rental agreement when you signed it?

17 A. That he was to pay 200 a month, and I never
18 got any rent. And that's why he got the eviction
19 notice.

20 Q. You said earlier that he tried to set up an
21 account to pay rent?

22 A. He wanted to set up some kind of account in a
23 bank, and I didn't want that, where he could have done a
24 money order and sent to my address, and he didn't
25 attempt that.

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1 Mr. Clark?

2 A. Yes, I did.

3 Q. Do you know when that was?

4 A. It was either the end of June, first part of
5 July.

6 Q. And why did you call Officer Davis?

7 A. Trying to have him removed from the property.

8 Q. And why were you trying to have him removed
9 from the property?

10 A. His -- in the rental agreement, it said not to
11 exceed 60 days if he hadn't paid the \$200.

12 Q. And did Officer Davis respond to your call?

13 A. Yes.

14 Q. What did he do?

15 A. He assisted with me to 460-1/2 Popular where
16 Kerry Clark resided.

17 Q. What did he do specifically?

18 A. Who?

19 Q. Officer Davis.

20 A. He knocked on the door and asked him to leave.
21 And Kerry Clark said that he would leave, but his van
22 was broke down. So I gave him an extra week to leave,
23 and then an hour later I seen him driving his van. But
24 he was going to voluntarily leave at that point.

25 Q. So you asked Officer Davis to trespass Kerry

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1 Clark?

2 A. Yes.

3 Q. And Officer Davis responded and asked
4 Mr. Clark to leave.

5 A. Yes.

6 Q. Did you have a court order at that time?

7 A. No.

8 Q. Had you filed an eviction notice at that time?

9 A. No.

10 Q. Did Mr. Clark leave?

11 A. No.

12 Q. Did you have to call Officer Davis again after
13 that?

14 A. No.

15 Q. Do you know if Officer Davis came back to the
16 property after this initial interaction?

17 A. I had heard that he did, but I didn't -- I
18 wasn't there personally.

19 Q. Who did you hear from that he had been back
20 out there?

21 A. Mr. Maffiea -- Michael.

22 Q. Was Mr. Maffei involved in calling Officer
23 Davis the first time?

24 A. No.

25 Q. That was just your idea?

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1 A. Yes.

2 Q. And do you know if you called his office
3 number or a cell number?

4 A. A cell phone number.

5 Q. And how did you have his cell phone number?

6 A. It's on the recording that when you call the
7 city hall or the police office.

8 Q. So you were physically present when Officer
9 Davis came out to the property?

10 A. Yes.

11 Q. Who else was there besides you, Mr. Clark and
12 Officer Davis?

13 A. He had some other people inside the residence.

14 Q. Do you know how many?

15 A. Three.

16 Q. And do you know who those people were?

17 A. No.

18 Q. Was one of them Tiffany?

19 A. No.

20 Q. And did Officer Davis say anything to those
21 people?

22 A. Just that they had to leave also.

23 Q. Did you tell Officer Davis that you had a
24 rental agreement with Mr. Clark?

25 A. Yes.

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1 Q. Did you show him that rental agreement?

2 A. Yes.

3 Q. Was Mr. Maffei, the next door neighbor, was he
4 present when Officer Davis came out?

5 A. No. It was just me and Mr. Rhett Davis.

6 Q. Have you sold the property at 460 Poplar?

7 A. No.

8 Q. You still own it?

9 A. Yes.

10 Q. Did you enter into negotiations to sell the
11 property?

12 A. Yes.

13 Q. With whom?

14 A. Harvey Maffietta, or what --

15 MR. JOHNSON: How do you pronounce your
16 last name?

17 MR. MAFFEI: "Maf-fay."

18 MR. JOHNSON: Maffei.

19 BY MR. JOHNSON: (Continuing)

20 Q. Harvey Maffei?

21 A. Yes.

22 Q. And did you enter into a sales agreement with
23 Harvey Maffei?

24 A. There was just a written agreement, a paper
25 agreement.

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1 had there been any damage done to the cabin?

2 A. Yes.

3 Q. What was the condition of the cabin on
4 August 23rd?

5 A. The outside, it was dug up around it. The
6 hole in the back. All his garbage was out front. There
7 was none of the household trash taken away of his own.
8 And there was no running water, so he had all of his
9 dirty dishes out in front.

10 Q. So was there any damage done to the property
11 that you think had not been caused by Mr. Clark?

12 A. No.

13 Q. Did Mr. Clark vacate in response to this
14 notice?

15 A. No.

16 Q. So when did he eventually vacate?

17 A. It was probably the first part of September.

18 Q. And do you know why he finally left?

19 A. No.

20 Q. Do you know if Mr. Maffei or his brother ever
21 asked him to leave?

22 A. Yes, because he was -- Mr. Harvey was in the
23 process of buying it at that time.

24 Q. Did you ever witness Harvey or Michael Maffei
25 ask Mr. Clark to leave?

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1 A. Yes.

2 Q. When was that?

3 A. Probably in August.

4 Q. When did you first start negotiating with
5 Harvey Maffei to purchase the 460 Poplar?

6 A. Maybe the first part of August of 2016. I'm
7 not sure, exact date.

8 Q. Had you been talking to Harvey or Michael
9 Maffei about that?

10 A. Both.

11 Q. And do you remember if you'd been talking to
12 them for a while before you signed a sales contract with
13 them?

14 A. No.

15 MR. WARREN: Object to the form of the
16 question. She didn't say she signed a sales contract
17 with both of them.

18 BY MR. JOHNSON: (Continuing)

19 Q. What do you remember about either Harvey or
20 Michael Maffei asking Mr. Clark to leave?

21 A. That he was given a eviction notice and also
22 asked by the chief of police to leave, and he never did.

23 Q. And do you remember when -- so just to be
24 clear, did you witness a time when both Harvey and
25 Michael Maffei asked Mr. Clark to leave?

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1 A. Yes.

2 Q. And do you remember when that was?

3 A. No.

4 Q. Was it after you had begun discussions to sell
5 the property to Harvey Maffei?

6 A. Yes, and after the eviction notice.

7 Q. So sometime after August 23rd?

8 A. Mm-hm.

9 MR. WARREN: Yes?

10 THE WITNESS: Yes.

11 BY MR. JOHNSON: (Continuing)

12 Q. Did you ever witness Mr. Maffei or -- Michael
13 Maffei or Harvey Maffei ask Mr. Clark to leave before
14 August 23rd?

15 A. No.

16 Q. Did you ever talk to them about Mr. Clark
17 leaving the cabin?

18 A. No. I wanted him gone before anything else
19 happened.

20 Q. Did you ever tell Mr. Clark that you couldn't
21 accept rent because you were selling the property?

22 A. No.

23 Q. Did Mr. Clark ever talk to you about buying
24 the property?

25 A. Yes.

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1 Officer Allen in relation to having Mr. Clark removed?

2 A. I -- one time for me, the first time, when he
3 voluntarily was going to leave and he never did. And so
4 that's when I gave him a week extension because he said
5 his van was broke down, and an hour later I seen it --
6 he was driving it.

7 Q. Did you ever communicate with Officer Davis or
8 Officer Allen by text or e-mail?

9 A. No.

10 Q. Did you ever call Officer Allen in response to
11 having anyone removed from 460 or 460-1/2 Poplar?

12 A. No. This was just handed.

13 MR. WARREN: You're pointing to
14 Exhibit 5?

15 THE WITNESS: Exhibit 5.

16 BY MR. JOHNSON: (Continuing)

17 Q. It was just handed to whom?

18 A. To Mr. Michael Maffei, because I had to work.

19 Q. And what did you tell Mr. Maffei when you
20 handed it to him?

21 A. I just asked him if he could hand Exhibit
22 Number 5 to Mr. Allen.

23 Q. Do you remember when Harvey Maffei moved in --
24 Do you remember if you wrote this on July 6, 2016?

25 A. I wrote it on July 6, 2016, and then I think

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1 Q. And where were you at the time you made the
2 call?

3 A. Out front of the house.

4 Q. Out front of 460 Poplar?

5 A. Yes.

6 Q. And so what specifically did you tell Chief
7 Davis?

8 A. That I wanted Mr. Clark removed. He hadn't
9 paid any rent and I didn't like the traffic that was
10 going in and out of there.

11 Q. Anything else?

12 A. And the garbage and stuff that was left around
13 there.

14 Q. Anything else?

15 A. No.

16 Q. And you said neither Michael Maffei nor Harvey
17 Maffei were involved in that incident?

18 A. No.

19 Q. And did Chief Davis respond?

20 A. Yes.

21 Q. And did he come to the house at 460?

22 A. We both met in front and walked out to 460-1/2
23 Poplar.

24 Q. And who did you see?

25 A. I saw Kerry Clark, and I don't know who the

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1 other three people were.

2 Q. You don't know any of them at all?

3 A. No.

4 Q. Whether male or female?

5 A. Seems like there was one female and two males.

6 Q. Do you know what they were doing?

7 A. No.

8 Q. Did you get any more specific in your
9 complaint to Chief Davis?

10 A. Just that I would like him removed, and that's
11 when he voluntarily said he would leave and move out.

12 Q. When you say "he," you're talking about
13 Mr. Clark?

14 A. Kerry Clark. And so that's when he said his
15 van was broke down, and then an hour later I seen him
16 driving it.

17 Q. So tell me specifically what you and Chief
18 Davis did.

19 A. We walked to 460-1/2. He knocked -- Mr. Rhett
20 Davis knocked on the door and he said that he would like
21 Mr. Clark to be -- leave, or Mr. Rhett Davis was going
22 to get him for trespassing. And that's when Kerry said
23 that he would voluntarily leave.

24 Q. Was the chief talking to everybody in that
25 room, everybody needs to be out?

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1 A. More or less Kerry Clark and also his people
2 that were there.

3 Q. And had you requested that they be trespassed?

4 A. Yes.

5 Q. And did you -- I thought you said earlier you
6 thought you showed a rental agreement to the chief.

7 A. I did.

8 Q. Did you have that with you at the time?

9 A. Yes. I carry it with me all the time.

10 Q. So you're talking about Exhibit 1?

11 A. Yes.

12 Q. So you actually showed a copy of that to the
13 chief at that time?

14 A. Yes. I don't know if it was at that time or
15 shortly after, but it was that same period of time.

16 Q. Are you sure it wasn't later that you showed
17 that to him?

18 A. Not that I recall.

19 Q. Do you remember any conversation where the
20 chief asked you if you had anything in writing and you
21 said you didn't?

22 A. No.

23 Q. Did you later talk to the chief about this
24 incident?

25 A. Of the incident of removing Mr. Clark?

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1 Q. Yes. Getting rid of the -- asking the people
2 that were in that shed to leave.

3 A. I never talked to Mr. Davis after that.

4 Q. Did you talk to anybody else at the city about
5 it?

6 A. No.

7 Q. So you said that Chief Davis knocked on the
8 door --

9 He didn't kick the door in?

10 A. No.

11 Q. You said he knocked on the door and there was
12 a group of people inside, four people, it sounds like,
13 total?

14 A. Yes.

15 Q. And he asked them -- he said that Mr. Clark
16 needed to leave or something to that effect?

17 A. Yes.

18 Q. And then did he also say the others needed to
19 leave?

20 A. Yes.

21 Q. And then --

22 A. They were on my property.

23 Q. And you didn't want them there.

24 A. No.

25 Q. And then you said Mr. Clark volunteered to

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1 Q. And did you agree to the purchase price with
2 Harvey Maffei to sell it for this \$23,200?

3 A. Yes.

4 Q. And then you said it -- Mr. Harvey Maffei
5 moved into the property at 460, the main house,
6 sometime, I think you said, in August, correct?

7 A. Yes.

8 Q. And then he later moved out and moved to
9 Kansas, you said? Moved back to Kansas?

10 A. Yes. Family health.

11 Q. Did you ever try to sell the property after
12 Harvey Maffei left?

13 A. No.

14 Q. Are you trying to sell it now?

15 A. No.

16 Q. Is it in tax foreclosure?

17 A. Yes.

18 Q. Did you ever provide Harvey Maffei with a copy
19 of Exhibit 1, the landlord lease agreement, lease rental
20 agreement?

21 A. No, but I showed it to him.

22 Q. So when did you do that?

23 A. Shortly after he moved in.

24 Q. Did you actually see plaintiff tearing any of
25 the property down besides the floor tile that you said

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1 he tore up?

2 A. I never seen him actually doing it, but later
3 I seen where stuff was damaged.

4 Q. Did your mom have property that she left you
5 and your brother that was still there in the cabin and
6 in the shed or in the backyard?

7 A. I didn't really know.

8 Q. Did you go through your mom's property after
9 she passed away?

10 A. No.

11 Q. And your mom's first name is Sylvia?

12 A. Yes.

13 Q. Sylvia Jelen?

14 A. Yes.

15 Q. When did she pass away?

16 A. Eight or nine years ago.

17 Q. And did you take steps at that time to put the
18 property in your name and your brother's name?

19 A. I didn't fulfill the steps of getting it in my
20 name. It's still in my mom's name, Sylvia Jelen.

21 Q. But you're basing your ownership upon the fact
22 that you and your brother are the only heirs to your
23 mom's estate?

24 A. Yes.

25 Q. Are there rat nests in the cabin?

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1 A. Not to my knowledge.

2 Q. In the complaint it says that you had a prior
3 agreement with Michael Maffei to purchase the property
4 for \$15,000.

5 Did you have any written agreement with
6 Michael Maffei to purchase the property?

7 A. No.

8 Q. Did you ever have an agreement with -- or did
9 Mr. Clark ever make an offer to you to buy the house and
10 the cabin for \$20,000?

11 A. Just verbally.

12 Q. He just said he would try to get a VA loan?

13 A. Yes.

14 Q. When did that conversation take place?

15 A. Maybe the first part of June. I don't know
16 exactly the date or month.

17 Q. Do you know if he ever took any steps to apply
18 to the VA?

19 A. No.

20 Q. You don't know?

21 A. No.

22 Q. Did he ever come back to you later and discuss
23 your agreement to purchase the property with Mr. Harvey
24 Maffei?

25 A. No.

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1 Q. Did you tell Mr. Clark that you had entered
2 into an agreement to sell the property to Harvey Maffei?

3 A. No.

4 Q. In the lawsuit, it says that you agreed to
5 sell the property to Mr. Clark for \$20,000.

6 Did you ever agree to that?

7 A. No.

8 Q. What did you understand you had discussed?

9 A. That he was going to try to get a VA loan to
10 purchase the property, but I didn't give him an answer,
11 yes or no.

12 Q. At that time when that happened, that
13 discussion happened, was the property vacant?

14 A. Yes. My brother just shortly got
15 incarcerated.

16 Q. So it was about mid-June then?

17 A. Yes.

18 Q. So when I said the property, the main house
19 was vacant --

20 A. Yes.

21 Q. -- or was Angie Armstrong still there?

22 A. Maybe it was after she vacated it in the end
23 of June.

24 Q. But Mr. Clark was living in the cabin.

25 A. Yes.

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1 Q. He says in the complaint, on July 7, 2016, he
2 attempted to pay rent to you.

3 Did that ever happen?

4 A. No. And he also had my P.O. box number to
5 send the money order.

6 Q. I understand.

7 Says in the lawsuit, on or about July 9th
8 Officer Davis arrived at the residence unannounced with
9 you and defendant Maffei.

10 You said defendant Maffei wasn't there.
11 Michael Maffei wasn't there.

12 A. No. It was just me and Mr. Rhett Davis.

13 Q. It says officer Davis threw open the front
14 door --

15 A. No.

16 Q. -- and entered the dwelling unit.

17 A. No.

18 Q. Did he ever go into the cabin at all?

19 A. Mr. Davis?

20 Q. Yes.

21 A. He knocked on the door and we talked to him
22 through the door.

23 Q. So he never went through the threshold?

24 A. No.

25 Q. Did Mr. Clark have a copy of this lease and

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1 rental agreement at the time that Chief Davis was there?

2 Did he offer to show that to the chief?

3 A. He just said he did. He never showed it.

4 Q. And when was the -- after that incident with
5 Chief Davis, that interaction, when was the next time
6 you saw Mr. Clark back at the property?

7 A. I don't -- I don't know exact date.

8 Q. Was he still there within the next couple
9 days? Had he returned?

10 A. Yes.

11 Q. And you'd given him some time, you said, to
12 get his belongings?

13 A. I gave him a week after the incident with
14 Mr. Davis and I there, but he said his van had broken
15 down.

16 Q. I understand that.

17 A. Mm-hm.

18 Q. Did you go back, then, and check to see if he
19 ever moved out after that week?

20 A. Yes.

21 Q. And what was the result?

22 A. His van was there and he was still there.

23 Q. Did you talk to him then?

24 A. No.

25 Q. And so the time frame would have been about

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1 the middle of July, about that time?

2 A. Yeah. Yes.

3 Q. So why didn't you post an eviction notice at
4 that point?

5 A. I just gave him more time.

6 Q. Did you tell him he had more time?

7 A. No.

8 Q. Did you ever go back to that cabin and check
9 the doors to see if they were locked and anybody was
10 there when Mr. Clark wasn't there?

11 A. No.

12 Q. So in mid-July, do you --

13 Well, first of all, does the cabin have a lock
14 on it?

15 A. Now?

16 Q. No. At the time.

17 A. I could see a padlock from the main house
18 kitchen window.

19 Q. So a padlock on the outside of the door?

20 A. Yes.

21 Q. Do you know who put the padlock on there?

22 A. Mr. Clark.

23 Q. Was there ever a padlock on there prior to him
24 moving in, in May 2016?

25 A. Yes.

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CERTIFICATE

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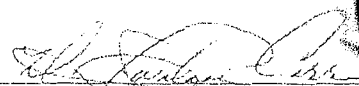
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I, D. Iwalani Carr, a certified Shorthand Reporter for Oregon, hereby certify that, pursuant to Federal Rules of Civil Procedure, DENYCE SHORB personally appeared before me at the time and place set forth in the caption hereof; that at said time and place I reported in Stenotype all testimony adduced and other oral proceedings had in the foregoing matter; that thereafter my notes were reduced to typewriting under my direction, and that the foregoing transcript, pages 1 to 93, both inclusive, constitutes a full, true and accurate record of all such testimony adduced and oral proceedings had, and of the whole thereof.

Witness my hand and CSR seal at Portland, Oregon, this 19th day of July, 2017.


 D. Iwalani Carr
 Certified Shorthand Reporter
 Certificate No. 90-0220
 License expires 9/30/19



Carr Court Reporting
 (503) 227-2277